

# **PUBLIC DISCLOSURE**

**January 7, 2008**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Capmark Bank  
57529**

**6955 Union Park Center, Suite 330  
Midvale, Utah 84047**

**Federal Deposit Insurance Corporation  
20 Exchange Place, 4<sup>th</sup> Floor  
New York, New York 10005**

**NOTE:**      **This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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## GENERAL INFORMATION

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

This document is an evaluation of the CRA performance of **Capmark Bank (Capmark), Midvale, Utah**, prepared by the **Federal Deposit Insurance Corporation**, the institution's supervisory agency, as of **January 7, 2008**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.

**INSTITUTION'S CRA RATING:** This institution is rated **Outstanding**.

Bank management and personnel continue to be proactively involved in the provision of community development activities that positively impact the bank's assessment area. Since the last CRA evaluation on January 10, 2005, the bank's qualified community development lending and investment activity within the assessment area totaled \$ 46,063,776. This represents 1.07 percent of average quarterly assets.

The bank is a nationwide lender and as such, has qualified investments in other areas. The overall CRA qualified investments have increased significantly as a result of purchasing an equity interest in numerous "Low Income Housing Tax Credits" (LIHTC). The qualified community development activities totaled \$246 million, representing 5.7 percent of average assets over the reporting period. Since LIHTC represent over 80 percent of total qualified activities, these investments have significantly impacted the affordable housing market. Overall, Capmark's community development activities represent an outstanding effort in meeting credit and other financial services needs. The following tables delineate these activities and substantiate the rating assigned.

<b>Community Development Loans &amp; Investments - Current Bank Activity</b>	
<b>Investment / Entity</b>	<b>Investments/Loans Extended</b>
<b>2005 Investment Totals</b>	<b>5,399,178</b>
<b>2006 Investment Totals</b>	<b>1,177,153</b>
<b>2007 Investment Totals</b>	<b>765,255</b>
<b>2005 - 2007 Loan Totals</b>	<b>38,722,190</b>
<b>Total Current Period AA Loans &amp; Investments for Capmark</b>	<b>46,063,776</b>
<b>Affiliate Current Period Activity</b> (not claimed by any other financial institution for CRA credit)	<b>199,997,617</b>
<b>GRAND TOTALS</b>	<b>246,061,393</b>

\*2005 Reporting Period begins January 10, 2005  
Total Assets as of 09/31/2007 - \$8,119,633,000  
Average Assets over the Evaluation Period - \$4,301,822,000

<b>Community Development Services</b>	
<b>Service Hours Current Period</b>	<b>216</b>
<b>Affiliate Service Hours – Current Period</b> (not claimed by any other financial institution for CRA credit)	<b>12</b>
<b>GRAND TOTAL SERVICE HOURS</b>	<b>228</b>

## DESCRIPTION OF INSTITUTION

Capmark is an industrial bank chartered under the laws of the State of Utah. Capmark does not directly lend or solicit deposits from consumer customers. The bank's principal business location has not changed since the last CRA examination. The bank continues to be a wholesale real estate lender originating large commercial real estate loans, including a niche in multifamily mortgage lending. Consequently, Capmark has received a formal designation as a "wholesale institution" for CRA purposes. As such, its CRA performance is evaluated under the Community Development Test through its qualified community development lending, qualified investments, or community development services. Capmark has total assets of \$7.2 billion as of year-end 2007 and is a wholly-owned subsidiary of Capmark Financial Group, Inc. in Horsham, Pennsylvania. The following shows information about the financial makeup of the institution:

### ASSET GROWTH

Call Date:	12/31/2004	Call Date:	09/30/2007
Total Assets:	2,367,779	Total Assets:	8,119,633

### DEPOSIT INFORMATION

Non-Interest	Interest Bearing
4,479	6,807,143

### BREAK-DOWN OF LOAN PORTFOLIO

Loan Type	Dollar Volume	% of Portfolio
Consumer Loans		.00
Commercial Loans	4,779,988	68.15
Farm Loans		.00
Multi-Family Loans	1,519,292	21.66
Residential Loans		.00
Other	714,951	10.19

As noted, the bank has experienced substantive growth and has been able to maintain a substantive representation of community development loans and investments, despite the rapid growth. This further is indicative of the bank's commitment to the CRA.

## DESCRIPTION OF THE ASSESSMENT AREA

Capmark defined its assessment area as Salt Lake County, Utah. This is an area comprised of 193 contiguous census tracts. The Department of Housing and Urban Development (HUD) estimates the 2007 median family income (MFI) for the Metropolitan Statistical Area (MSA) at \$60,100. The bank's assessment area is home to most of the major insured financial institutions in the state, including several regional banks, credit unions, and many other industrial loan companies. The following table reflects the census tract income designations, population, and household breakdown of the Salt Lake County as determined by the 2000 US Census:

<b>DEMOGRAPHIC INFORMATION OF ASSESSMENT AREA – 2007</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>N/A * % of #</b>
Geographies (Census Tracts)	193	2.59	22.28	46.63	28.50	0.00
Population by Geography	898,387	0.85	23.55	48.82	26.78	0.00
Owner-Occupied Housing by Geography	310,988	0.21	17.40	51.86	30.53	0.00
Business by Geography – 2006	89,860	8.56	22.71	40.18	28.56	0.00
Family Distribution by Income Level	215,864	16.99	19.92	24.85	38.23	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	79,691	1.56	35.80	49.27	13.37	0.00
HUD Updated MSA Median Family Income		\$60,100				
Households (HH) Below Poverty Level 7.71% of total HH		22,754				

Source: \*2000 US Census/ 2006 Business data & 2007 HUD updated Median Family Income

Salt Lake County is the most populous county in Utah, with an estimated population of 898,387 for 2007. Salt Lake County had the second highest population increase in the State with 18,089. The county's average annual growth rate from 2006 to 2007 has been 2.3 percent, below the state average of 3.2 percent. Salt Lake County's average household size is 2.90 people per household compared to the state average of 3.08 people per household (Census estimates 2006). Salt Lake County is expected to grow to a population of 4.4 million by the year 2030.

The agricultural production in Salt Lake County is expected to decrease as urbanization of the county converts agricultural lands into residential, retail, and industrial uses. However, in 2006, there was a higher demand for grain as a source of energy, especially corn for the production of ethanol.

During the year 2006, Salt Lake County reported 4,800 residential building permits, the second highest in the state. By the end of September 2006, nonresidential construction grew to \$503.1 million. Several large projects were approved by the end of the year in Salt Lake County including a \$63.6 million local Church History Library and the \$1.8 billion City Creek Center (a mixed-use center in downtown Salt Lake City). Year-to-date 2007 projects that have been established include the new Regional Intermountain Medical Center located in Murray City and the IKEA retail store in the city of Draper.

Utah's robust and diverse economy continues to attract new business, job seekers, and others to the State, resulting in a building boom. The health and stability of the Salt Lake market has proven to be a magnet for national investors, as well as real estate investments.

Even with the tremendous growth the area is experiencing, Salt Lake remains a highly attractive and affordable metropolitan area. Utah's economy also contributed to increased activity within the industrial sector. The majority of new construction projects in 2006 were centered in speculative big box facilities. There was a significant rise in lease rates due to higher construction costs. This increase in lease rates encouraged many users to purchase a facility instead of renting space. Year-to-date 2007 industrial market has remained strong. Along with the research capabilities and technology innovations found in Salt Lake County, companies continue to move and grow here because of traditional factors as well.

Other significant advantages that the State of Utah offers employers are the quality and growth of its work force. Utah's 2007 employment growth of 4.5 percent was among the highest in the nation, but slightly below last year. The unemployment rate averaged 2.5 percent for 2007. In Salt Lake County, the state's largest county in terms of population, job growth was 4.5 percent for 2007. It is anticipated that growth in 2008 will continue to be strong, in the 4.5 percent range. The technological knowledge of Utah's workforce is evident in the fact that the State ranks second in the nation for the percentage of households with computers. Utah is one of only a few states in the country with a growing indigenous labor force.

## COMMUNITY CONTACTS

A community contact was initiated with a non-profit affordable housing organization. The individual contacted indicated a strong ongoing need for affordable housing. This includes multi-family housing as well as single-family residences. The organization indicated that they could always use more grants and donations.

Other needs identified include credit, homebuyer, and other related financial literacy training (pre-purchase counseling for first-time homebuyers). The economic development in the area identified by various governments included rehabilitation of low-to-moderate income areas, healthcare for low-to-moderate-income families and individuals among other things.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's CRA performance under the community development test for wholesale institutions is considered outstanding. Senior management has demonstrated a role in many of the bank's community development activities. The evaluation period is from January 10, 2005 to January 7, 2008. Relevant data and information regarding the bank's qualified community development activities are detailed on the following pages.

Salt Lake County is unique in that it is home to numerous large and small-specialized industrial banks that operate nationwide. The region is also home to a large number of the more typical local and regional retail banks. They each vie for a piece of the limited supply of qualified community development opportunities in Salt Lake County and Utah to satisfy each of their CRA obligations. The opportunity for any one of these institutions to get any sizeable portion of qualified loans or investments benefiting the local area is small. Given this, Capmark has had an excellent participation level of qualified community development loans originated for various purposes.

## COMMUNITY DEVELOPMENT LENDING

Capmark has originated six loans totaling \$38,722,190 within the targeted assessment area. This is substantial considering the level of competition present in the State. Most of area's local institutions, both industrial banks and retail banks, participate in a statewide consortium that funds affordable housing and other CRA-qualified loans. The table below summarizes Capmark's qualified loans:

<b>Community Development Loans</b>		
<b>Year</b>	<b>Recipient</b>	<b>New Extensions During Year (\$)</b>
<b>2005</b>	A State Housing Corporation	8,485,000
	<b>2005 Totals</b>	<b>8,485,000</b>
<b>2006</b>	NA	0
	<b>2006 Totals</b>	<b>0</b>
<b>2007</b>	A Multi-Ethnic Senior Housing Development	4,000,000
	A Senior Citizen Development	1,287,700
	Affordable Housing Development	8,927,690
	Senior Affordable Housing Development	3,771,800
	Corporation providing/stabilizing Employment	12,250,000
	<b>2007 Totals</b>	<b>30,237,190</b>
<b>Combined</b>	<b>Assessment Period Totals</b>	<b>38,722,190</b>

\*Reporting period for 2005 began January 10th



The following is a breakdown of activities by aforementioned recipients and beneficiaries:

**A State Housing Corporation** – In 2005, Capmark granted an \$8,485,000 loan to renovate an apartment complex with 144 units in existing buildings. Renovation began in October 2005 and was completed by October 2006. The property is currently an 80 percent market rate property and will be converted to a 100 percent Low Income Housing Tax Credit (LIHTC) property. There has been little multifamily residential development in the neighborhood due to the lack of developable land in the area. Most apartment complexes are 10 to 20 years old.

**A Multi Ethnic Senior Housing Development (MESHD)** – Capmark provided \$4,000,000 of financial assistance to MESHD towards the construction of a 141-unit apartment complex targeting affordable housing for low-income seniors.

**A Senior Citizen Development** – Capmark granted this non-profit organization \$1,287,700 in loan financing for the rehabilitation of a 32-unit apartment complex. This corporation provides elderly persons and disabled persons with housing facilities and services specially designed to meet their physical, social and psychological needs; and to promote their health, security, and usefulness in longer living.

**Multi-Family Affordable Housing Development** – This project involved the renovation of an existing apartment complex. The property consists of 263 apartment units renovated using the financing from Capmark. The funds of \$8,927,690, were used mainly for interior improvements. The 263 apartment complex provides rents that target low- and moderate-income families.

**Senior Affordable Housing Development** - This HUD project is an acquisition/rehabilitation of a 110 unit apartment complex with rents priced as follows: 60 units at 80 percent or less of area median income and 50 units at 50 percent or less of area median income. Capmark provided a loan of \$3,771,800 for the rehabilitation of this low-income housing project.

**A Corporation Providing/Stabilizing Employment** – This corporation, now under new management, is ramping up operations by increasing food services for the newly sought after in-house business groups. It is expected that the low- and moderate-income work force will be significantly impacted in a positive way by providing additional stable longer-term employment. Capmark financed 12,250,000 for the renovations.

## **COMMUNITY DEVELOPMENT INVESTMENTS**

Capmark has provided an exceptional level of qualified community development investments and made numerous grants and donations relative to the institution's business strategy, available opportunities, and competition within the assessment area. Capmark was given credit for LIHTCs purchased by an affiliate outside its assessment area in 2005 and 2006.

The following table summarizes the bank's exceptional qualified investments, commitments, and donation/grants used in evaluating the bank's CRA performance at this examination:

<b>Community Development Investments</b>			
<b>Year</b>	<b>Investment or Entity</b>	<b>#</b>	<b>Amount Extended (\$)</b>
<b>2005*</b>	FNMA Arm Pool	1	1,004,839
	State Housing Bond	1	550,000
	Low Income Housing Tax Credits(LIHTC)**	1	3,784,719
	Low Income Housing Tax Credits(LIHTC)***	33	149,999,951
	Grants & Donations	8	59,620
	<b>2005 Totals</b>		<b>155,399,129</b>
<b>2006</b>	FNMA Arm Pool	1	757,153
	State Housing Bond	1	340,000
	Low Income Housing Tax Credits(LIHTC)***	11	49,997,666
	Grants & Donations	45	80,000
	<b>2006 Totals</b>		<b>51,174,819</b>
<b>2007</b>	FNMA Arm Pool	1	575,255
	State Housing Bond	1	100,000
	Grants & Donations	40	90,000
	<b>2007 Totals</b>		<b>765,255</b>
	<b>Assessment Period Grand Total</b>	<b>144**</b>	<b>207,339,203</b>

\*2005 Reporting Period began January 10th \*\*Inside Assessment Area

\*\*\*Nationwide Tax Credits

The following are some of the notable investments that demonstrate the impact of these projects during the assessment period:

**Multi-Family Affordable Housing** (new construction) – This project consists of 238 affordable residential units located in Las Vegas, Nevada. The property has 146 two-bedroom units and 92 one-bedroom units. All of the units in the project (the “tax credit units”) will be rented to individuals whose income is equal to or less than 60 percent of area median income (AMI). Ten of the units are set aside for Seniors 55 years and older; with four units set at 40 percent and 6 units set at 60 percent of AMI. Rents for the subject property are well below market rate rents for the area.

**Senior Citizen Affordable Housing** (rehabilitation) – This project was a rehabilitation/adaptive reuse of a historic mill facility located on the northern edge of downtown Sacramento, California. The project consists of 143 units, with 112 units targeted to very low and low-income householders aged 55 years and older. The 112 units will be comprised of two newly constructed five-story buildings with elevators, one containing 72 units, and one containing 40 units. All of these LIHTC units will have rent restrictions to the 30, 45, 50, and 60 percent of AMI. The subject property is designed to separate the age-restricted LIHTC units from the non-age restricted loft units (in a rehabilitated structure) creating a mixed-age development not unique to the area. Tenant services are available for the mature adults; these services are provided by Project Go, a non-profit service provider in which the developer is a partner. Services include exercise and health management programs, nutrition workshops, educational classes, and social activities.

**Multi-Family Affordable Housing** (new construction) – This project development consists of a newly constructed 72 unit complex located in Gordonsville, Tennessee, comprised of 10 two-story buildings with 50 two-bedroom units and 22 three-bedroom units renting at 50 and 60 percent of AMI levels. The project accepts Section 8 vouchers.

**Multi-Family Affordable Housing** (renovation) – This project involved the renovation of an existing apartment complex in Akron, Ohio. The property consists of 240 apartment units renovated using LIHTC targeting households with incomes up to 60 percent of AMI. The apartment complex is comprised of two and three-bedroom garden-style units and three and four-bedroom townhouse units with a renewed 20-year **HAP** contract with an effective date of June 2006.

**Multi-Family Affordable Housing** (acquisition/rehabilitation) - The project is an acquisition/rehabilitation of a 144 unit apartment complex with 100 percent of units rented to individuals whose income is equal to or less than 60 percent of the area median gross income. In 2005, an affiliate (acting as an equity provider) purchased and syndicated the LIHTCs totaling \$3.7 million with \$3.2 million funded. In addition, another affiliate corporation made a loan of \$8.4 million to a state housing corporation to issue its' Series 2005 multifamily housing revenue bonds for the project. This loan was underwritten with credit enhancements by Fannie Mae under its Delegated Underwriting and Servicing (DUS) lending program.

### Qualified Grants & Donations

Capmark is focused on providing essential services to educate and assist low- and moderate-income individuals. During the examination period, Capmark made \$229,620 in qualified grants and donations to 93 non-profit organizations inside the bank's assessment area. The following table illustrates the wide range of community needs served:

<b>Grants &amp; Donations</b>			
<b>Type of Organization</b>	<b>2005* (\$)</b>	<b>2006 (\$)</b>	<b>2007 (\$)</b>
Self Sufficiency and Education	36,920	31,500	27,750
Job Training and Employment	0	3,500	15,750
Homeless/Transitional Housing/Affordable Housing	2,000	14,500	21,500
Elderly/Child Day Care	0	5,500	5,000
Legal Assistance / Healthcare	20,700	21,500	16,000
Sponsorships/Scholarships/Memberships	0	3,500	4,000
<b>Total by Year – Bank Only</b>	<b>59,620</b>	<b>80,000</b>	<b>90,000</b>
<b>GRAND TOTALS</b>	<b>\$229,620</b>		

\*Reporting Period for 2005 began January 10th

The following is a brief description of the services provided by these organizations.

**Self-Sufficiency and Education** – Facilitate the means for non-profit organizations to provide education to children and adults so that they may be able to achieve self-sufficiency. Households participate in homebuyer education workshops and counseling, children participate in financial literacy classes, and the volunteers are provided the materials to train/teach the school-aged students.

**Job Training & Employment** – Attention is given to providing skill training to low-income individuals with physical, emotional, financial, and domestic challenges. People with disabilities are given the opportunity to obtain real jobs with competitive pay and the opportunity for advancement. Successful employment programs give the knowledge, tools, courage, confidence, and encouragement to succeed in employment. The programs combined workshop training, mentoring, coaching, employment referral services, business clothing referral services and more to help low- and moderate-income individuals achieve their full potential in the workforce.

**Homeless/Transitional Housing/Affordable Housing** – The main focus of the state and the nation is empowering homeless individuals with basic needs and skills to aid them in mainstreaming into society. Capmark recognizes the need and provides funds for those programs that aid individuals in obtaining housing assistance, transitional housing, as well as permanent affordable housing.

**Elderly/Child Day Care** – The baby-boomers are retiring and many times without sufficient income or physical capacity to take care of their essential needs. Younger couples with children are not making the anticipated income needed to care for their growing families. Capmark works to lessen stress and financial burden placed on young families, as well as the elderly on fixed income by funding non-profit organizations that are set up to be caregivers, and educators for this segment of society.

**Legal Assistance – Healthcare** – Individuals such as single and separated mothers, homeless families, disabled individuals, minorities, and the elderly are often times without needed funds to provide them with legal representation. Medical crises are more devastating than any other family crises. Few situations place greater stress on parents and families. While there have been tremendous advances in the medical field, the families' financial and emotional burdens remain. These programs were created to help ease some of these burdens. Capmark fills some of this gap by contributing to these non-profit agencies.

**Sponsorships/Scholarships/Memberships** –The programs are tools they use to accomplish their missions, achieve their vision of building strong kids, strong families and strong communities, and reinforce core values of caring, honesty, respect and responsibility. These programs use an asset-building approach in their work. Each program is different and reflects the needs of the local community. Capmark supports the need and provides funds for those programs by their grants and donations.

## **COMMUNITY DEVELOPMENT SERVICES**

Capmark encourages employees to become engaged in services needed in the communities in which they live and work. Together bank personnel, management and Board members contributed 228 accredited hours of service to their respective communities.

Service hours provide for a wide range of human needs ranging from providing essential services to achieving self-sufficiency for low- and moderate-income and disabled individuals. The Banks' Compliance Officer continually reviews the services provided by Capmark personnel as well as the Board to ensure the bank is meeting the changing community needs. Through CRA qualified board and committee service, as well as through other volunteer opportunities, employees have volunteered their time to several CRA qualified activities. Capmark employees and members of management, based on their skills and qualifications, have filled committee positions with local non-profit organizations. The following page describes these service activities.

<b>COMMUNITY DEVELOPMENT SERVICES</b>				
<b>Qualifying Services</b>	<b>Activity</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
Affordable/Accessible Housing Homeless/Transitional Housing	Members of management and employees provided numerous hours of service on Boards and Committees of qualifying non-profit entities, providing mortgage and financing information, and assisting in renovations.	23	26	8
Credit/Legal Education	Provide consumer education programs in Title I schools and other organizations.	28	19	8
Essential Services	Provide assistance to low-income individuals through nonprofit organizations in various areas such as legal services, after school programs, shelter, food, language training etc.	24	36	6
Other	Work with numerous committees and special interests to implement new programs addressing emerging needs of the community.	2		
Essential Services and Community Development	A wide variety of services were provided to targeted areas in need. Through a well planned and investigated needs assessment of the community that the bank serves.	16		12
Financial Educational Literacy	Provide financial literacy training to low- and moderate-income individuals at schools/facilities. This included coverage of the following topics: making wise financial decisions, understanding various bank account types, importance of a good credit history, managing credit wisely, reality of interest, and exploring career choices and education.	18	2	
<b>TOTAL OVERALL HOURS</b>	<b>228</b>	<b>111</b>	<b>83</b>	<b>34</b>

The following is a small sample of the many services provided by Capmark to the communities that it serves:

- A statewide coalition of nonprofit, corporate and government groups helping individuals and families save and build wealth. Through information, advice, and encouragement. The coalition assists people who wish to pay down debt, build an emergency fund, afford a home, education, investments, or retirement in order to improve their standard of living and most important, gain peace of mind.
- A non-profit organization dedicated to educating students about work readiness, entrepreneurship and financial literacy through experiential, hands-on programs. The programs help prepare young people for the real world by showing them how to generate wealth and effectively manage it, how to create jobs which make their communities more robust, and how to apply entrepreneurial thinking to the workplace. Students put these lessons into action, and help strengthen their communities. In addition, the hands-on experiences help young people understand the economics of life. In partnership with businesses and educators, this program brings the real world to students, opening their minds to their potential.
- A foundation that brings families and communities in need together with volunteers and resources to build decent, affordable housing for low-income households. The program requires a down payment and the monthly mortgage payments. Homeowners invest hundreds of hours of their own labor in “sweat equity” into building their house and the houses of others. These houses are affordable for low-income families because there is no profit included in the sale price. Mortgage length varies from seven to 30 years.

### **Compliance with Antidiscrimination Laws**

No violations of the substantive provisions of antidiscrimination laws and regulations were identified.

## APPENDIX A

SCOPE OF EXAMINATION		
TIME PERIOD REVIEWED	January 10, 2005 to January 7, 2008	
FINANCIAL INSTITUTION		PRODUCTS REVIEWED
Capmark Bank, Midvale, Utah		Community Development Loans Community Development Investments Community Development Services
AFFILIATE	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
Escrow Bank, Midvale, Utah*	Affiliate Company	Qualified Investments Qualified Services
Capmark Financial, Horsham, PA	Parent Company (Corporation)	Qualified Investments

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
UTAH Salt Lake County (035)	Full-Scope – On Site	N/A	None

\*Escrow Bank has been given a CRA exemption by the FDIC